

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ETHICON NON-REVISION PTO 298 (ELECTION WAVE) CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR RESPONSES IN OPPOSITION TO PLAINTIFFS'
MOTION TO EXCLUDE THE TESTIMONY OF KIMBERLY KENTON, M.D.**

Defendants Ethicon, Inc. and Johnson & Johnson (collectively, “Ethicon”) submit this notice in response to Plaintiffs’ Notice of Adoption of Prior *Daubert* Motion of Kimberly Kenton, M.D. for Non-Revision PTO 298 (Election Wave), Doc. 7293. In their Notice of Adoption, Plaintiffs adopt and incorporate their *Daubert* motion filed against Kimberly Kenton for Ethicon Wave 1. *See* Doc. 2087 (motion) & Doc. 2088 (memorandum in support).¹ Ethicon hereby adopts and incorporates by reference its Responses to Plaintiffs’ *Daubert* motions filed against Kimberly Kenton, M.D., in Wave 1 (Doc. 2132) and Wave 3 (Doc. 2939). This response applies to the Non-Revision PTO 298 Election Wave cases identified in Exhibit A to Plaintiffs’ Notice of Adoption.

¹ On August 31, 2016, this Court issued a Memorandum Opinion and Order on Plaintiffs’ Wave 1 Motion to Exclude the Expert Testimony of Kimberly Kenton, M.D. [ECF No. 2087], Doc. 2705 (Opinion and Order), which was adopted by the Court again in Wave 3 on July 20, 2017, in Wave 5 on July 27, 2018, in Wave 6 on July 30, 2018, and in Wave 7 on August 6, 2018, in its Orders Adopting Memorandum Opinion and Order, Doc. 4167, 6406, 6440, and 6521.

Respectfully Submitted,

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U.S. DISTRICT JUDGE**

CERTIFICATE OF SERVICE

I, William M. Gage, certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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